

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

WALSH CONSTRUCTION COMPANY PUERTO RICO CIVIL NO. 3:12-CV-01401-GLS

Plaintiff

v.

UNITED SURETY & INDEMNITY COMPANY

Defendant

**MOTION TO WITHDRAW LEGAL REPRESENTATION**

**TO THE HONORABLE COURT:**

Comes now defendant, **United Surety & Indemnity Company**, hereinafter USIC, through the undersigned counsel and respectfully states and prays:

1. The undersigned has been representing USIC as counsel of record in this case.
2. The undersigned has informed USIC that, for personal reasons, he will resign from its legal representation.
3. Recently, Messrs. Luis E. Fusté-Lacourt and Gregorio J. Igartúa-Arbona, of the law firm Igartúa & Fusté, assumed the additional legal representation of USIC. The undersigned has turned over to them all the physical and electronic files of this case in his possession, with USIC's authorization.

4. The undersigned does not owe USIC any money for legal services paid in advance and not performed.

5. The undersigned respectfully submits that his withdrawal of USIC's legal representation will not delay the proceedings in this case, because Messrs. Fusté and Igartúa will continue representing USIC.

**WHEREFORE**, it is respectfully requested from this Honorable Court that it allow the undersigned attorney to withdraw his legal representation of USIC in this case.

**RESPECTFULLY SUBMITTED.**

**CERTIFICATE OF SERVICE:** I hereby certify that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

In San Juan, Puerto Rico, this 15th day of January, 2025.

/s/ CARLOS LUGO FIOL - USDC-PR #203203  
Attorney for Defendant-USIC

**CARLOS LUGO-FIOL**  
PO Box 260150  
San Juan PR 00926  
Tel: (787) 645 -4211  
E-mail: clugofiol@gmail.com